

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

United States of America

v.

Sami Amin Al-Arian

Case No.8.03-CR-77-T-30TBM

Amended Motion for Bill of Particulars

Comes now the accused Sami Al-Arian in his proper and moves pursuant to Rule 7 of the Federal Rules of Criminal Procedure (F.R.C.P.) for the entry of an order granting a Bill of Particulars with respect to the now pending indictment. As grounds for the foregoing, the accused avers that the indictment is without sufficient specificity for the accused to prepare a defense. Defendant reserves the right to amend, expand and enhance this Bill of Particulars with his counsel of choice in the future.

With respect to the portion of the indictment titled the Introduction:

1. State with specificity the exact date, time and place of the creation of the Palestinian Islamic Jihad (P.I.J.).
2. State with specificity all the known alleged cells of the P.I.J.
3. State with specificity the alleged structure of the P.I.J.
4. State with specificity when and where the P.I.J. Manifesto was created.
5. State with specificity all of the names of individuals who are alleged to have created the P.I.J. manifesto
6. State with specificity all of the names of individuals alleged to be members of the Shura Council, their terms of service and their alleged titles.

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7. State with specificity how the alleged P.I.J Manifesto rejected any peaceful solution to the Palestinian cause.
8. State with specificity what exactly is the Palestinian cause.
9. State with specificity what is the Jihad Solution.
10. State with specificity what is meant by the martyrdom style.
11. State with specificity what is meant by the term “liberation” as used in paragraph 3 of the indictment.
12. State with specificity what is meant by the phrase “destroy Israel.”
13. State with specificity what is meant by the phrase “end all Western influence (of the Great Satan America) in the region regardless of the cost to inhabitants.”
14. State with specificity the names of the individuals who died while committing acts of violence on behalf of the P.I.J.
15. State with specificity the exact time and place of the act or acts of violence described in paragraph 4 of the indictment.
16. State the name of the person described in paragraph 4 as a “detainee.”
17. State what is meant by the “occupied territories.”
18. State with specificity who or what entities occupy the occupied territories.
19. State with specificity upon what legal authority the occupying entity occupies and continues to occupy the occupying territory.
20. State with specificity the time and place the occupying entity began its occupation of the occupied territory.
21. State with specificity when and how Fathi Shiqaqi became the Secretary General of the P.I.J. as described in paragraph 6.

22. State with specificity the exact date, time and place when and where Sami Al-Arian became a member of the P.I.J.
23. State with specificity how an individual becomes a member of the P.I.J.
24. State with specificity when and where was the date, time and place Sami Al-Arian became a member of the Shura Council.
25. State with specificity how an individual becomes a member of the Shura Council.
26. State with specificity when and where was the date, time and place Sami Al-Arian became a secretary of the Shura Council.
27. State with specificity how an individual becomes a secretary of the Shura Council.
28. State with specificity when and where was the exact date, time and place that it is alleged that Sami Al-Arian became the “leader” of the P.I.J. in the United States.
29. State the exact term of office of the leader of the P.I.J. in the United States.
30. State with specificity why, how and when Sami Al-Arian had become the treasurer of the P.I.J.
31. State the name of unindicted coconspirator twelve as mentioned in paragraph 14.
32. State the exact reasons why unindicted coconspirator twelve was deported.
33. State with specificity the current whereabouts of unindicted coconspirator twelve
34. State with specificity what is meant by the terms “close associate” as utilized in term 15 of the indictment.
35. List all alleged members of the P.I.J. who were teachers and students at the University of South Florida (USF) as described in paragraph 16 of the indictment.
36. List the dates, times and places where each of the individuals named in the response to particular 35 were teachers or students at USF.

37. State with specificity how the P.I.J. utilized the USF as an instrumentality of the P.I.J.
38. List all of the conferences and meetings (with dates, times and places) the purpose of which was to bring other P.I.J. members into the U.S.
39. List all the conferences which it is alleged were not academic conferences and/or meetings.
40. State exactly how urea, a chemical compound, was to be used in this indictment to create an explosive device.
41. State exact dates and times that the P.I.J. became a criminal organization as contemplated by the laws of the United States.
42. State the exact date, time and place that the P.I.J. became an enterprise as contemplated by Title 18 of the U.S. Code.
43. State exactly how the I.C.P. was a part of the P.I.J. enterprise.
44. State with specificity what acts allegedly undertaken by the I.C.P. establish an illegal relationship with the P.I.J.
45. State when, where and how the I.C.P. engaged in acts of violence, including murder, extortion, money laundering, fraud and misuse of visas.
46. State exactly how WISE was a part of the P.I.J. enterprise.
47. State with specificity what acts allegedly undertaken by WISE establish an illegal relationship with the P.I.J.
48. State when, where and how WISE engaged in acts of violence, including murder, extortion, money laundering, fraud and misuse of visas.
49. State exactly how IAF was a part of the P.I.J. enterprise.

50. State with specificity what act allegedly undertaken by the I.A.F. established an illegal relationship with the P.I.J.
51. State when, where and how ICP engaged in acts of violence, including murder, extortion, money laundering, fraud and misuse of visa.
52. State all known "other" organizations which are alleged to be a part of the enterprise.
53. State with specificity all acts allegedly undertaken by the accused Sami Al-Arian that involve murder in violation of Florida statutes 782.04 and 777.04(3).
54. State with specificity all acts allegedly undertaken by Sami Al-Arian which involve extortion, in violation of Florida statutes 836.05, 777.011 and 777.04
55. State with specificity all acts allegedly undertaken by Sami Al-Arian which involve money laundering.
56. State with specificity all acts allegedly undertaken by Sami Al-Arian which involve interstate or foreign travel or transportation with the intent to promote and carry on an unlawful activity.
57. State with specificity what facilities in interstate commerce were allegedly utilized by Sami Al-Arian with intent to promote unlawful activities.
58. State with specificity all unlawful activity that Sami Al-Arian is alleged to have promoted.
59. State with specificity the exact dates, times and places when and where Sami Al-Arian is alleged to have promoted and carried on unlawful activity.
60. State with specificity the exact conduct undertaken by Sami Al-Arian that the government alleges constitutes promotion of unlawful activity.

61. State with specificity all acts allegedly undertaken by Sami Al-Arian which establish his involvement with any conspiracy to kill, kidnap, maim or injure persons in a foreign country.

62. State with specificity the exact date, time and place where it is alleged that Sami Al-Arian entered into a conspiracy to kill, kidnap, main or injure persons in a foreign country.

63. State with specificity all evidence that Sami Al-Arian had prior knowledge of any acts involving murder, kidnapping, maiming or the injury of any persons.

64. State with specificity all overt acts undertaken by Sami Al-Arian which the government alleges are overt acts in furtherance of a conspiracy to kill, maim or injure persons in a foreign country.

65. State with specificity all acts undertaken by Sami Al-Arian which the government alleges constitute material support to designated foreign terrorist organizations.

66. State with specificity the names of all persons allegedly killed, maimed, kidnapped or injured by any act of Sami Al-Arian.

67. State the exact dates, times and places when and where each person named in particular #65 was allegedly either killed, maimed, kidnapped or injured.

68. State with specificity all the dates, times and places when and where Sami Al-Arian is alleged to have rendered material support to a terrorist organization.

69. State with specificity all acts undertaken by Sami Al-Arian that constitute fraud and misuse of visa, permits or other documents.

70. State the exact dates, times and places when and where it is alleged that Sami Al-Arian committed acts of fraud and misuse of visa, permits or other documents.

71. State with specificity the 256 acts that it is alleged that Sami Al-Arian committed in furtherance of the conspiracy.
72. State with specificity the exact dates, times and places Same Al-Arian is alleged to have committed the overt acts in particular #70
73. State how the structures, facilities and academic environment of USF were allegedly utilized by Sami Al-Arian to conceal the activities of the P.I.J.
74. State exactly what activities were allegedly undertaken by Sami Al-Arian to utilize the facilities and academic environment to further the cause of the P.I.J.
75. State the exact dates, times and places when and where Sami Al-Arian utilized the facilities and academic environment to further the cause of the P.I.J.
76. State with specificity what is meant by the terms “academic environment.”
77. State with specificity what facilities it is alleged that Sami Al-Arian used.
78. State with specificity all cells of the P.I.J. that Sami Al-Arian established.
79. State all countries in which cells of the P.I.J. are established.
80. State with specificity all known activities of the P.I.J..
81. State with specificity any and all evidence that Sami Amin Al-Arian had any prior knowledge of any acts against the inhabitants of Israel or other nations, including murders and suicide bombings.
82. State with specificity all acts undertaken by Sami Al-Arian to solicit anyone to commit a suicide bombing.
83. State with specificity all of the aims and goals of the P.I.J.
84. State with specificity whether one of the stated goals of the P.I.J. was to end the Israeli occupation of Palestine and create a Palestinian state.

85. State with specificity any and all acts undertaken by the state of Israel that constitute murder, extortion and conspiracy to kill inhabitants of the occupied territories.

86. Provide all evidence in the possession, custody and control of the United States of America that would tend to establish that the P.I.J. was founded in response to the treatment of the Palestinian people engaged in by the occupying country of Israel and its ally, the United States.

87. State whether the goals of the P.I.J. were to further terrorism or to seek the liberation of the occupied territory.

88. State the names of all of the terrorist organizations with whom the P.I.J. sought to increase its standing.

89. State each and every conference the United States alleges was conducted in furtherance of the conspiracy or enterprise.

90. State the names, dates and nationalities of all known terrorists who were admitted into the United States as a result of an invitation from Sami Al-Arian.

91. State how known terrorists were permitted into the United States.

92. State all the goals that fund raising and conferences were intended to promote.

93. State with specificity, including the dates, times and places, all fundraising events organized by Sami Al-Arian.

94. State with specificity, including the dates, times and places, all travel undertaken by Sami Al-Arian to further the aims and goals of the P.I.J.

95. List all letters and other documents authored or received by Sami Al-Arian which the government believes furthered the goals of the P.I.J.

96. State with specificity all uses of the Internet by Sami Al-Arian that allegedly furthered the aims and goals of the P.I.J.
97. State with specificity the dates, times and places when and where the oral advocacy of the aims and goals of the P.I.J. took place.
98. State with specificity whether Sami Al-Arian sent money or material support to the P.I.J.
99. State with specificity the dates, times and locations where money and/or material support was sent to the P.I.J. by Sami Al-Arian
100. State with specificity all writings of Sami Al-Arian that urged death to Israel and its supporters.
101. State with specificity all writings, including books and periodicals, that the government contends were written for the purpose of furthering the aims of the P.I.J.
102. State the dates, times and places that such writings were created.
103. State with specificity the names of all individuals who allegedly provided wills for Sami Al-Arian to hold.
104. State with specificity the exact dates, times and places where and when any wills came into possession of the accused Sami Al-Arian.
105. State with specificity the exact location where Sami Al-Arian allegedly kept these wills.
106. State whether the government of Israel destroyed the homes of the families of the individuals the government contends were martyrs.
107. State with specificity the names and nationalities of all individuals the government alleges to be martyrs.

108. State with specificity the exact dates, times and places of the deaths of all people the government alleges to be martyrs.
109. State the exact dates, times and places of the payments the government alleges were received by the family of martyrs.
110. State the exact dates, times and places of all payments that the government alleges were paid to detainees.
111. State with specificity how the payments to detainees or martyrs promotes the goals of the P.I.J.
112. State with specificity all management functions the government alleges were performed by the accused Sami Al-Arian.
113. State with specificity the exact dates, times and places that it is alleged that the accused Sami Al-Arian performed the management functions stated in the previous particular.
114. State each and every terrorist organization with which the accused Sami Al-Arian is alleged to have associations.
115. State with specificity each and every act of violence which is alleged to have occurred as a result of any association between Sami Al-Arian and any terrorist organization.
116. State the names of any and all enterprise members who were utilized as communication facilitators who assisted enterprise members in Israel and the occupied territory.
117. State with specificity the names of all enterprise members who were allegedly facilitated by enterprise members in the U.S.

118. State with specificity the names of all enterprise members who were allegedly facilitated in Syria and other nations.
119. State with specificity the dates, times and places of all acts alleged to be facilitations.
120. State with specificity all dates, times and places of any alleged communications concerning urea.
121. State with specificity the locations to which the urea was allegedly going to be shipped.
122. State the exact dates, times and places of any conversations involving urea.
123. State the names of all persons who were parties to any conversation concerning urea.
124. State with specificity each false, misleading and evasive statement alleged to have been made to the Immigration and Naturalization Service (INS).
125. State the name of each person who is alleged to have made a false, misleading and evasive statement to the INS.
126. State the exact dates, times and places that it is alleged that false, misleading or evasive statements were made to the INS.
127. State the names of all individuals who allegedly submitted false, misleading or evasive documents to the INS.
128. State the names of all individuals who caused others to submit false, misleading or evasive documents to the INS.
129. State the exact dates, times and places that any false, misleading or evasive statements were submitted to the INS.

130. State with specificity the names of all terrorists who were permitted to enter, remain and work in the U.S.
131. State the names of each enterprise member who was permitted to enter, remain and work in the U.S.
132. State with specificity the distinction between terrorist and enterprise member as expressed in item 40 of the indictment.
133. State with specificity how enterprise members are alleged to have impeded, obstructed and influenced the administration of justice.
134. State the names of each influential individual from which enterprise members sought support.
135. State the dates, times and places when and where members of the enterprise made efforts to obtain the support of influential individuals.
136. State the meaning of the phrase “under the guise of promoting and protecting Arab rights.”
137. State with specificity each statement that the government contends was made by any member of the enterprise that was made “under the guise of promoting Arab rights.”
138. State the names and associations of any member of the media to whom any alleged member of the enterprise made a false statement.
139. State the names and associations of any member of the media to whom any alleged member of the enterprise misrepresented facts.
140. State exactly how members of the enterprise misrepresented facts to members of the media.

141. State the exact dates, times and places that members of the enterprise misrepresented facts.
142. State the exact dates, times and places that members of the enterprise made false statements to the media.
143. List each and every media report that the government alleges was influenced by a false or misleading statement that was made to the media.
144. State with specificity each and every mechanism the government alleges that members of the enterprise misrepresented, concealed or hid in furtherance of the conspiracy.
145. List every date, time and place where it is alleged that a member of the enterprise hid or concealed an act in furtherance of the conspiracy.
146. List each and every person it is alleged that these acts were hidden from.
147. State the names of the individuals who the government alleges Sami Al-Arian attempted to recruit to join the P.I.J. on December 22, 1988.
148. State the location of the ICP event at which Abd Al Aziz Awda is alleged to have spoken on December 17, 1989.
149. State what is meant by the phrase "the spiritual leader of the P.I.J.."
150. State the name of the individual who allegedly introduced Abd Al Aziz Awda.
151. State the name of unindicted coconspirator #1.
152. State with specificity what is meant by the term "intifada."
153. State with specificity what is meant by the term "jihad."
154. State with specificity what is meant by the phrase "associated with the P.I.J.."

155. State with specificity what is meant by the phrase “a suicide attack” as utilized in Overt Act 13.
156. State with specificity how the computer file was modified as alleged in Overt Act 14.
157. State with specificity how it was determined that Sami Al-Arian allegedly modified computer files of the wills referenced in Overt Act 14.
158. State whether Bashir Mosa Mohammed Nafi was ever employed by WISE as research director.
159. State the dates and times that Bashir Mosa Mohammed Nafi was employed by WISE.
160. State the name of the coconspirator referenced in Overt Act 16.
161. State with specificity the exact words spoken by Ramadan Abdullah Shallah mentioned in Overt Act 17.
162. State the names of the recently convicted terrorists serving sentences in jails as stated in Overt Act 19.
163. State the exact relationship between the recently convicted terrorists named in Overt Act 19 and Zahera-Agbarya, Rokayah Agbarya, Mostafa Agbarra and Bashra Suleiman.
164. State the exact dates and times when unindicted coconspirator #12 worked at WISE.
165. State the name of the coconspirator named in Overt Act 24.
166. State the name of each and every person alleged to be a member of the P.I.J. in Overt Act 27.

167. State with specificity the conversation in Overt Act 27 that showed that P.I.J. leaders and members decided the P.I.J. did not need to create a non-violent organization.
168. State the name of every individual who is alleged to be on the finance committee as alleged in Overt Act 28.
169. State with specificity what is meant by the phrase "reorganization of the P.I.J."
170. State with specificity the contents of the conversation referenced in Overt Act 31 that stated that the P.I.J. could afford to pay 400 martyrs.
171. State with specificity where in the conversation in Overt Act 33 there was a discussion about nonviolent activities
172. State with specificity the locations and addresses of the several homes the government alleges were owned by the P.I.J. as asserted in Overt Act 36.
173. State where in the Middle East the facsimile mentioned in Overt Act 35 was sent.
174. State with specificity the names of each member of the P.I.J. who is alleged to have received a facsimile referenced in Overt Act 38.
175. State the name of the individual(s) who sent the facsimile described in Overt Act 40.
176. State the names of all individuals who allegedly distributed money for the P.I.J. as referenced in Overt Act 44.
177. State with specificity the exact relationship between the P.I.J. and Iran as alleged in Overt Act 48.
178. State where overseas Muhammed Tasir Hassen Al-Khatib was as referenced in Overt Act 50.

179. State with specificity from whom Sami Al-Arian is alleged to have received a fax as stated in Overt Act 52.
180. State with specificity what the government alleges the \$350,000 stated in Overt Act 53 represents.
181. State the name of the other P.I.J. member who was to travel to Iran for a meeting with Sami Al-Arian.
182. State the alleged purpose of the meeting in Iran.
183. State with specificity from whom it is alleged the accused Sami Al-Arian raised \$53,000 as stated in Overt Act 62.
184. State with specificity what the \$53,000 referenced in Overt Act 62 were raised for.
185. State with specificity what is meant by the phrase "status of martyrs' families" as stated in Overt Act 62.
186. State with specificity who the person alleged to have returned from a fundraising trip in the Sudan is as alleged in Overt Act 62, and on whose behalf he or she was working.
187. State with specificity the name of the "private individual" in Overt Act 62.
188. State the name of the individual alleged in Overt Act 64.
189. State the location overseas Abu Muhanid was when he had the conversation alleged in Overt Act 67.
190. State with specificity whether any of the information contained in the facsimile discussed in Overt Act 69 was false.

191. State the date, time and place when and where a false visa was obtained for Canada as alleged in Overt Act 69.
192. State the name of the unknown individual addressed in Overt Act 71.
193. State with specificity what is meant by the phrase “to be spent on activities not aid” as stated in Overt Act 73.
194. State the name of the P.I.J. members who were adversely affecting their ability to get money into the occupied territories as stated in Overt Act 74.
195. State the names of the several P.I.J. members referenced in Overt Act 75.
196. State with specificity the nature of the problems with travel documents referenced in Overt Act 75.
197. State the name of the person described in Overt Act 76 as not possessing travel documents.
198. State the name of the place described as a particular location as described in Overt Act 76.
199. State with specificity what is meant by the phrase P.I.J. members in the “North.”
200. State with specificity the exact nature of the problems discussed in Overt Act 77.
201. State the names of the persons described as incoming students in Overt Act 78.
202. State the names of the individuals described as sources in Sudan.
203. State the meaning of the terms associated with the P.I.J. as stated in Overt Act 80.
204. State the names of persons murdered and injured in Overt Act 80.
205. State the names of persons alleged to be P.I.J. members as alleged in Overt Act 81.
206. State the name of Unindicted Coconspirator #3.

207. State the exact amount of money it is alleged Sami Al-Arian received as stated in Overt Act #87.
208. State the name of the person who it is alleged was caught with \$30,000 at the border as alleged in Overt Act 87.
209. State the name of the person described as "the boy" in Overt Act 87.
210. State with specificity the contents of the conversation referenced in Overt Act 86 in which Sami Al-Arian said that he was aware and concerned about the whereabouts of "the boy" and his activities during the night before the bombing.
211. State what is meant by the phrase "the Tampa group" as stated in Overt Act 81.
212. State the exact amount of money due to the Tampa group as alleged in Overt Act 89.
213. State the exact nature of the document that is mentioned in Overt Act 90.
214. State the name of the unidentified male alleged in Overt Act 92.
215. State the name of the associate of Sami Al-Arian as alleged in Overt Act 92.
216. State with specificity how Sami Al-Arian was not pleased as alleged in Overt Act 92.
217. State the location of Samir as alleged in Overt Act 94.
218. State to whom or to what entity Islamic Jihad Movement Circular #12 was sent as alleged in Overt Act 95.
219. State the names of each faction of the P.I.J..
220. State the aims, goals and objectives of each faction of the P.I.J. as alleged in Overt Act 96.
221. State with specificity from whom and to whom the fax was sent in Overt Act 97.

222. As specified in Overt Act 97, state whether the list of people killed includes civilians.
223. State whether the beneficiaries alleged in Overt Act 101 were people who had their homes destroyed.
224. State with specificity what is meant by the term “The Center” as utilized in Overt Act 102.
225. State with specificity what is meant by the phrase “‘the Youth’ in Sudan” in Overt Act 103.
226. State with specificity who the two sides are as mentioned in Over Act 106.
227. State with specificity what is meant by the phrase “hoped all in the P.I.J. would support it” in Overt Act 105.
228. State with specificity the identity of Ahmed Yousef.
229. State with specificity who is the coconspirator in Overt Act 108.
230. State with specificity who is the coconspirator in Overt Act 109.
231. State with specificity from whom and from where Sami Al-Arian received the two facsimiles mentioned in Overt Acts 111 and 112.
232. State with specificity to whom or to what entity it is alleged that Sami Al-Arian transmitted the facsimile described in Overt Act 113.
233. State with specificity to whom or to what entity it is alleged that Sami Al-Arian transmitted the facsimile described in Overt Act 114.
234. State the name of the coconspirator who murdered three people and is alleged to be associated with the P.I.J..

235. State the exact meaning of the phrase “associated with the P.I.J.” as utilized in Overt Act 115.
236. State with specificity to whom or to what entity the note Sami Al-Arian is alleged to have been sent in Overt Act 116.
237. State with specificity to whom or to what entity the facsimile Sami Al-Arian is alleged to have been transmitted in Overt Act 117.
238. State with specificity to whom Sami Al-Arian sent a note in Overt Act 118.
239. State with specificity from whom Sami Al-Arian received the facsimile in Overt Act 119.
240. State the name of each and every co-conspirator who allegedly transmitted facsimiles from WISE/ICP as alleged in Overt Act 120.
241. State the names of all coconspirators associated with the P.I.J. who were involved in Overt Act 121.
242. State with specificity the names and professions of all 22 people in Overt Act 121.
243. State the name of the person or entity that provided the facsimile discussed in Overt Act 122.
244. State from whom or what entity it is alleged Sami Al-Arian received the facsimile referenced in Overt Act 123.
245. State the name of Unindicted Coconspirator #4.
246. State the name of the coconspirator who allegedly sent the facsimile to Bahrain as alleged in Overt Act 125.
247. State the name of the coconspirator referenced in Overt Act 126.

248. State from whom or what entity Sami Al-Arian received the U.S. Senate resolution condemning the P.I.J. as referenced in Overt Act 129.
249. State with specificity what is meant by the phrase “money/assistance to WISE” as referenced in Overt Act 131.
250. State with specificity what is meant by the term “town” as referenced in Overt Act 134.
251. State the name of the unidentified man as referenced in Overt Act 134.
252. State with specificity the destination of the \$15,000 in Overt Act 134.
253. State with specificity what is meant by the term “issue no.17” as referenced in Overt Act 136.
254. State the name of the unidentified man as referenced in Overt Act 137.
255. State who the unidentified male is as referenced in Overt Act 137.
256. State what is meant by the term “them” as referenced in Overt Act 143.
257. State with specificity how Sami Al-Arian caused a facsimile to be sent to “Brother Yousef” as stated in Overt Act 145.
258. State from whom or what entity Sami Al-Arian is alleged to have received the facsimile referenced in Overt Act 146.
259. State from whom or what entity Sami Al-Arian is alleged to have received the facsimile referenced in Overt Act 147.
260. State with specificity what is meant by the term “coconspirator associated with the P.I.J. as utilized in Overt Act 151.
261. State from whom or what entity Sami Al-Arian is alleged to have received the facsimile referenced in Overt Act 152.

262. State the name of the coconspirators referenced in Overt Act 152.
263. State from whom or what entity Sami Al-Arian is alleged to have received the P.I.J. press release as referenced in Overt Act 153.
264. State with specificity the identity of "Jamil" as referenced in Overt Act 159.
265. State with specificity the identity of the "other address" referenced in Overt Act 169.
266. State with specificity the identity of the other person in Overt Act 169.
267. State the name of the person referenced as the "person" in Overt Act 170.
268. State the name of the other terrorist leader referenced in Overt Act 171.
269. State the name of the associate referenced in Overt Act 176.
270. State with specificity what is meant by the word "goods" in Overt Act 176.
271. State with specificity the name of Unindicted Coconspirator #2.
272. State the name and affiliation of the journalist with the Tampa Tribune referenced in Overt Act 182.
273. State with specificity the name of Unindicted Coconspirator #5.
274. State the name of the unidentified male referenced in Overt Act 187.
275. State with specificity the name of Unindicted Coconspirator #6 as referenced in Overt Act 188.
276. State the name of the individual referenced in Overt Act 187.
277. State with specificity the name of Unindicted Coconspirator #7 as referenced in Overt Act 189.
278. State the names of the coconspirators associated with the P.I.J. referenced in Overt Act 190.

279. State with specificity what is meant by the phrase “coconspirators associated with the P.I.J.” as referenced in Overt Act 190.
280. State with specificity the name of the individual in Overt Act 191.
281. State with specificity the name of Unindicted Coconspirator #8 as referenced in Overt Act 194.
282. State the name of the other person as referenced in Overt Act 195.
283. State with specificity the name of Unindicted Coconspirator #9 as referenced in Overt Act 196.
284. State with specificity the intended target of the funds in Overt Act 197.
285. State the names of the two individuals in Overt Act 201.
286. State with specificity the reason that Sameeh Hammoudeh is alleged to have traveled to Chicago on behalf of Sami Al-Arian as alleged in Overt Act 202.
287. State the names of the coconspirators associated with the P.I.J. referred to in Overt Act 204.
288. State with specificity what is meant by coconspirators associated with the P.I.J. in Overt Act 204.
289. State the name of the person alleged to be the contact referenced in Overt Act 220.
290. State with specificity the name of Unindicted Coconspirator #10.
291. State with specificity the name of the wife of Unindicted Coconspirator #10.
292. State with specificity the intended target of the funds in Overt Acts 220 and 221.
293. State the telephone number alleged to have received a facsimile from Sami Al-Arian in Houston, Texas as stated in Overt Act 227.

294. State whether the “edits” made on the document referenced in Overt Act 227 are alleged to have been made by Sami Al-Arian.
295. State the name of the person who is alleged to have made the edits referred to in Overt Act 227.
296. State with specificity the names of the two individuals who are referred to as coconspirators associated with the P.I.J. in Overt Act 230.
297. State with specificity what is meant by the phrase “coconspirators associated with the P.I.J.” in Overt Act 230.
298. State the names of each and every individual involved in the operation of the web site referred to in Overt Act 233.
299. State with specificity the names of the coconspirators associated with the P.I.J. in Overt Act 234.
300. State with specificity what is meant by the phrase “coconspirators associated with the P.I.J.” in Overt Act 234.
301. State the name of the employee at the I.A.F. referenced in Overt Act 235.
302. State the name of the unidentified woman referenced in Overt Act 235.
303. State with specificity whether any money was sent to the I.A.F. by the woman referenced in the previous particular.
304. State with specificity the names of the coconspirator associated with the P.I.J. referenced in Overt Act 237.
305. State the name and phone number of the person referred to as the other individual in Overt Act 239

306. State with specificity the name of Unindicted Coconspirator #11 as referenced in Overt Act 240.
307. State the name of the employee of the IAF referred to in Overt Act 241.
308. State the name of the unidentified woman referred to in Overt Act 241.
309. State the names of the individuals referenced in Overt Act 243.
310. State with specificity what the shipment is in Overt Act 245
311. State the name of the employee of the IAF referred to in Overt Act 246.
312. State the name of the American Muslim referred to in Overt Act 246.
313. State with specificity what the donor list is as referenced in Overt Act 246.
314. State with specificity to whom the donor list belonged.
315. State the name of the employee of the IAF referred to in Overt Act 248.
316. State the names of the three undocumented workers at IAF as referred to in Overt Act 248.
317. State the names of the coconspirators associated with the P.I.J. referred to in Overt Act 252.
318. State what is meant by “coconspirator associated with the P.I.J.” as referred to in Overt Act 252.
319. State the names of the coconspirators associated with the P.I.J. as referenced in Overt Act 254.
320. State what is meant by “coconspirator associated with the P.I.J.” as referred to in Overt Act 254.
321. State with specificity how members of the conspiracy raised funds and provided support for the P.I.J. as stated on p.88(a) of the indictment.

322. State with specificity how members of the conspiracy worked with the P.I.J. in coordinating activities with Hamas as stated on p.88(b) of the indictment.
323. State with specificity in what P.I.J. financial operations the defendants were involved as stated on p.88(c) of the indictment.
324. State with specificity how Sami Al-Arian is connected to ongoing violent efforts against the State of Israel as stated on p.88(d) of the indictment.
325. State with specificity how Sami Al-Arian communicated to discuss the arrest of P.I.J. members as stated on p.90(g) of the indictment.
326. State with specificity what logistical assistance for terrorist activities was provided.
327. State with specificity, including names, dates and places, the nature of the financial assistance provided to family members of the martyrs and detainees.
328. State with specificity the services and support that Sami Al-Arian provided to Hamas and the P.I.J. after the prohibition as stated on p.93(l) of the indictment.
329. State with specificity how Sami Al-Arian continued to communicate with and provide support to the P.I.J. and Shikaki between May and October of 1995 as stated on p.93(n) of the indictment.
330. State with specificity where Ramadan Abdullah Shallah was between June and October of 1995.
331. State with specificity how Sami Al-Arian reorganized the manner by which he communicated with the P.I.J. and Ramadan Abdullah Shallah as stated on p.93(r) of the indictment.

332. State with specificity what acts Sami Al-Arian undertook to continue his logistical support of terrorism as stated on p.93(r) of the indictment.
333. State with specificity the events, places, times, dates and amounts of money wherein Sami Al-Arian continued to engage in P.I.J. fundraising and support activities.
334. State with specificity how Sami Al-Arian gave specific instructions to Sameeh Hammoudeh on what meetings to attend and where to travel, what those specific instructions were, and how the defendant provided money for that purpose as stated on p.93(s) of the indictment.
335. State with specificity what activities were conducted by Sameeh Hammoudeh at the behest of Sami Al-Arian.
336. State with specificity how, when and where Sami Al-Arian became an advisor to the P.I.J.
337. State with specificity what documents Sami Al-Arian edited for the P.I.J. and the contents therein.
338. State with specificity to whom these documents were forwarded.
339. State with specificity, including dates, times and events, the nature of Sami Al-Arian's continued fund-raising activities as stated on p.94(u) of the indictment.
340. State with specificity what actions Sami Al-Arian undertook to transfer funds to the P.I.J. inside and outside the United States.
341. State with specificity all actions, including names, dates and events since 1/25/95, that Sami Al-Arian undertook to combine, conspire, confederate and agree with other persons to commit offenses against the U.S. by making and receiving contributions of

funds, goods and services for the benefit of the P.I.J., Abd Al Aziz Awda, Fathi Shiqaqi and Ramadan Abdullah Shallah.

342. State with specificity how Overt Act 145 is a violation of Title 18, USC 1952(a)(2) and (3) and Title 18, USC, Section 2.

343. State with specificity how Overt Act 146 is a violation of Title 18, USC 1952(a)(2) and (3) and Title 18, USC, Section 2.

344. State with specificity how Overt Act 148 is a violation of Title 18, USC 1952(a)(2) and (3) and Title 18, USC, Section 2.

345. State with specificity how Overt Act 149 is a violation of Title 18, USC 1952(a)(2) and (3) and Title 18, USC, Section 2.

346. State with specificity how Overt Act 152 is a violation of Title 18, USC 1952(a)(2) and (3) and Title 18, USC, Section 2.

347. State with specificity how Overt Act 153 is a violation of Title 18, USC 1952(a)(2) and (3) and Title 18, USC, Section 2.

348. State with specificity how Overt Act 160 is a violation of Title 18, USC 1952(a)(2) and (3) and Title 18, USC, Section 2.

349. State with specificity how Overt Act 168 is a violation of Title 18, USC 1952(a)(2) and (3) and Title 18, USC, Section 2.

350. State with specificity how Overt Act 170 is a violation of Title 18, USC 1952(a)(2) and (3) and Title 18, USC, Section 2.

351. State with specificity how Overt Act 171 is a violation of Title 18, USC 1952(a)(2) and (3) and Title 18, USC, Section 2.

352. State with specificity how Overt Act 178 is a violation of Title 18, USC 1952(a)(2) and (3) and Title 18, USC, Section 2.
353. State with specificity how Overt Act 192 is a violation of Title 18, USC 1952(a)(2) and (3) and Title 18, USC, Section 2.
354. State with specificity how Overt Act 196 is a violation of Title 18, USC 1952(a)(2) and (3) and Title 18, USC, Section 2.
355. State with specificity how Overt Act 200 is a violation of Title 18, USC 1952(a)(2) and (3) and Title 18, USC, Section 2.
356. State with specificity how Overt Act 219 is a violation of Title 18, USC 1952(a)(2) and (3) and Title 18, USC, Section 2.
357. State with specificity how Overt Act 220 is a violation of Title 18, USC 1952(a)(2) and (3) and Title 18, USC, Section 2.
358. State with specificity how Overt Act 221 is a violation of Title 18, USC 1952(a)(2) and (3) and Title 18, USC, Section 2.
359. State with specificity how Overt Act 222 is a violation of Title 18, USC 1952(a)(2) and (3) and Title 18, USC, Section 2.
360. State with specificity how Overt Act 243 is a violation of Title 18, USC 1952(a)(2) and (3) and Title 18, USC, Section 2.
361. State with specificity how Sami Al-Arian ordered, incited, assisted or otherwise participated in the persecution of any person because of race, religion, national origin or political opinion.
362. State with specificity whether WISE is a membership organization.

363. State with specificity what is meant by “support freedom for Islam through violence.”
364. State with specificity how Sami Al-Arian supported freedom for Islam through violence.
365. State with specificity how Sami Al-Arian caused to be submitted into evidence a written declaration by Zied Abu-Amr.
366. State with specificity whether Zied Abu-Amr is a U.S. citizen.
367. State with specificity whether Zied Abu-Amr committed perjury.
368. State with specificity how Sami Al-Arian caused to be submitted into evidence a written declaration by Tarik Hamdi.
369. State with specificity whether Tarik Hamdi is a U.S. citizen.
370. State with specificity whether Tarik Hamdi committed perjury.
371. State with specificity how Sami Al-Arian caused to be submitted into evidence the testimony of Bashir Nafi.
372. State with specificity how Sami Al-Arian caused to be submitted into evidence the testimony of Nahla Al-Najjar.
373. State with specificity whether Nahla Al-Najjar is a U.S. citizen.
374. State with specificity whether Nahla Al-Najjar committed perjury.
375. State with specificity how Sami Al-Arian caused to be submitted into evidence the testimony of Nahla Al-Najjar on her own behalf.
376. State with specificity each and every unindicted coconspirator in Counts 1 through 4.

377. Specify each and every overt act not enumerated in Counts 1 through 4 of the indictment.

Dated: Sept. 15, 2003

Respectfully submitted,

Sari J. Al-Jarrah